

REMARKS

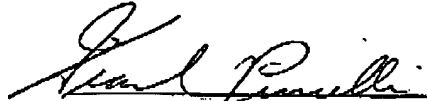
Applicant acknowledges the allowability of dependent claim 13 if it were rewritten in independent form to include the limitations of base claim and any intervening claims.

Applicants respectfully submit the primary reference relied upon by the Examiner EP 0 930,774 does not teach or suggest the invention as taught and claimed by Applicant. First, Applicant would like to point out that the present invention is directed to a kit for organizing a plurality of images obtained from a predetermined customer provided source. The kit includes at least a registration card for use in accessing a network photoservice provider for accomplishing certain operational tasks at the network photoservice provider. Further, independent claims 1 and 23 further include an image storage retaining device for capturing of images which also has a unique ID that has been forwarded to a database network photoservice provider. The independent claims clearly set forth that registration occurs prior to the service providers receipt of the image retaining device. The Watanabe reference is not directed to a kit nor does it teach the providing of a registration card that is registered with a service provider prior to receipt of the image retaining device. The '774 reference is simply directed to a system where images that have been stored on a service system can be grouped into different albums by remote customers. However, this reference is strictly dealing with images that have already been provided at the service provider. There is no teaching or suggestion of providing a registration card that is used for registering customer provided image retaining devices as taught and claimed by Applicant. The digital images capture devices are registered with the user. This is not the same as an image capture device on which the images are provided. The ID in the present invention is related to the image storage device or image retaining device whereas the ID referred to in the Watanabe reference is directed solely to the images themselves. Thus, the Watanabe reference is lacking in several respects. First, it does not disclose a kit and secondly, Watanabe does not teach the providing of a registration card as taught and, thirdly, Watanabe does not teach or suggest that the registration card is used for registering prior to receipt of the image retaining device as taught and

claimed by Applicant. Applicant respectfully submits that the cited art fails to teach or suggest the invention as claimed.

In view of the foregoing it is respectfully submitted that the claims in their present form are in condition for allowance and such action is respectfully requested.

Respectfully submitted,



Attorney for Applicants
Registration No. 27,370

Frank Pincelli/phw
Rochester, NY 14650
Telephone: (585) 588-2728
Facsimile: (585) 477-4646